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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

*Individual and Representative Plaintiffs,*

v.

META PLATFORMS, INC.,

*Defendant.*

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED RE:  
SUPPLEMENTAL LETTER**

Pursuant to Civil Local Rules 7-11, 79-5(f), and this Court’s Standing Order on Motions to Seal, Plaintiffs respectfully submit this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed, filed in connection with Plaintiffs’ Supplemental Letter. The attachments accompanying the Supplemental Letter contain material that Defendant Meta Platforms, Inc. (“Meta”), has designated as “Highly Confidential - Attorneys Eyes Only,” as defined in the parties’ Stipulated Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets (ECF No. 90, the “Protective Order”):

Document	Portions to be Filed Under Seal	Basis for Sealing Portion of Document
Appendix A	Full Document	Refers to material designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit A	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit B	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit C	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit D	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit E	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit F	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit G	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”

Because Meta chronically over-designated much of the record in this case, including designating the deposition transcripts of every Meta witness as “Highly Confidential—Attorneys’ Eyes Only” in their entirety, Plaintiffs must provisionally file the above-referenced documents under seal even though Plaintiffs do not believe they contain material that warrants sealing.

Dated: February 6, 2025

By: /s/ Maxwell V. Pritt  
Maxwell V. Pritt

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